

EC

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

In the Matter of the Extradition of
Jerome Norell Dee CRAIG

Case No. 2:24-mj-58

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2019 - Present in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 3184

Fugitive from foreign country to the United States

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.

Complainant's signature

Peyton Ross, Deputy United States Marshal, USMS

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/2/2024

City and state: Columbus, Ohio

Judge's signature

Elizabeth A. Preston Deavers, US Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In the matter of:

United States of America

v.

In the Matter of the Extradition of
JEROME NORELL DEE CRAIG

:
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:

Case No.:

Magistrate Judge

UNDER SEAL

2:24-mj-58

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Peyton Ross, Deputy United States Marshal, United States Marshals Service (USMS), being duly sworn, depose and state that:

INTRODUCTION

1. I make this affidavit in support of a criminal complaint to arrest Jerome Norell Dee **CRAIG** pursuant to and in accordance with Title 18 United States Code 3184 – fugitive from foreign country to the United States. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I did not include each and every fact known concerning this investigation. I did not withhold any information or evidence that would negate probable cause. I set forth only the facts that are believed to be necessary to establish probable cause that **CRAIG** committed the violation listed above.
2. I am a Deputy with the United States Marshals Service (USMS) and have been since August 2021. I am currently assigned to the USMS Southern Ohio Fugitive Apprehension Team (SOFAT) in the Southern District of Ohio. I have completed over 500 hours of instruction at the United States Marshals Service National Training Academy at the Federal Law Enforcement Training Center in Glynnco, Georgia (FLETC). During my employment with the USMS, I have been trained and received specific training on fugitive apprehension. While performing my duties as a Deputy U.S. Marshal, I have been involved in many fugitive investigations involving other federal, state, and local law enforcement agencies. Additionally, I personally have been assigned as the Lead Deputy on numerous fugitive investigations that have resulted in the apprehension of a wanted person(s).
3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from oral and written reports by other law enforcement officers, physical and video surveillance, subpoenaed and public records, database checks, and information gained through my training and experience.

STATEMENT REGARDING EXTRADITION

4. In this matter, I am assisting in representing the United States in fulfilling its treaty obligations to Germany. There is an extradition treaty in force between the United States and Germany (the "Treaty").¹
5. Pursuant to the Treaty, the Government of Germany has submitted a formal request through diplomatic channels for the extradition of Jerome Norell Dee **CRAIG** ("**CRAIG**").
6. Stacy Hauf, an Assistant Legal Adviser in the Office of the Legal Adviser of the United States Department of State, has provided the United States Department of Justice with a declaration authenticating a copy of the diplomatic note by which the request for extradition was made and a copy of the Treaty, stating that the Treaty covers the offenses for which Germany seeks extradition, and confirming that the documents supporting the request for extradition bear the certificate or seal of the Ministry of Justice, or Ministry or Department responsible for foreign affairs, of Germany, in accordance with Article 29 of the 1978 Treaty, as amended by Article 6 of the 2006 Second Supplementary Treaty, so as to enable them to be received into evidence.
7. The declaration from the U.S. Department of State with its attachments, including a copy of the diplomatic note from Germany, a copy of the Treaty, and the certified documents submitted in support of the request, (marked collectively as Complaint Exhibit #1) are filed with this complaint and incorporated by reference herein.
8. According to the information provided by the Government of Germany, **CRAIG** has committed (1) two counts of aggravated rape in conjunction with dangerous bodily harm in violation of section 177(1), (2), (5), (6), and (7), and section 223(1) and 224(1) of the German Criminal Code ("GCC"); (2) coercion in violation of section 240(1) and (2) of the GCC; and (3) possession of child pornography in violation of section 184(b)(1) and (3) of the GCC.
9. **CRAIG** committed the acts of which he is accused in Germany. On July 18, 2019, Judge Zwölfer-Martin at the Tiergarten Local Court in Berlin issued a warrant for **CRAIG**'s arrest citing the offenses listed above.² The warrant remains valid and enforceable.
10. The extradition request presents the following facts as the basis for Germany's arrest warrant and accusations against **CRAIG**:

¹ Treaty between the Government of the United States of America and the Federal Republic of Germany Concerning Extradition, U.S.-F.R.G., June 20, 1978, T.I.A.S. No. 9785 (the "1978 Treaty"), *as supplemented by* the Supplementary Extradition Treaty with the Federal Republic of Germany, U.S.-F.R.G., Oct. 21, 1986, S. TREATY DOC. NO. 100-6 (1987) (the "1986 Supplementary Treaty"), *and* the Second Supplementary Treaty to the Treaty between The United States of America and the Federal Republic of Germany Concerning Extradition, U.S.-F.R.G., Apr. 18, 2006, S. TREATY DOC. NO. 109-14 (2006) (the "2006 Second Supplementary Treaty"; collectively, the "Treaty").

² The German arrest warrant also included alleged offenses related to **CRAIG**'s possession of a pistol, knife, and at least one steel rod, recovered during the execution of a search warrant on **CRAIG**'s residence. Those offenses are not forwarded to the court for its consideration.

PROBABLE CAUSE

Overview of CRAIG's Rape, Coercion, and Possession of Child Pornography

11. On September 1, 2017, and again on June 26, 2018, **CRAIG** allegedly raped a 42-year-old woman (the "Victim") in Germany. In July 2018, the Victim submitted an online complaint detailing the rape in June 2018, and German police interviewed her in December 2018. During the interview, the Victim explained how in September 2017 **CRAIG** drugged and then raped her, inflicting bruises on her thighs, and then threatened her if she filed a criminal complaint. In June 2018, according to the Victim, **CRAIG** "rammed" his fist into her vagina without consent, inflicting severe harm, had anal sex with her, and then again threatened her if she reported **CRAIG's** violent acts or went to the hospital for treatment.
12. The Victim provided German police with medical and phone records that corroborated (1) the rapes, (2) the bodily harm she sustained during them, and (3) **CRAIG's** threats. Based on the information the Victim provided, German police sought and executed a search warrant on **CRAIG's** residence on March 7, 2019.
13. During the search of **CRAIG's** residence, police found a hard drive, laptop computer, and cellular phone containing child pornography. **CRAIG** was in possession of at least 1,448 image and video files depicting child pornography, including over 11 hours of child pornography videos, according to an IT expert that examined the devices. **CRAIG's** child pornography collection contained multiple images depicting sexual abuse of female babies and toddlers, including anal penetration of a toddler.

Details of CRAIG's 2017 Aggravated Rape and Coercion Offense

14. **CRAIG** and the Victim met in the Summer of 2017 via the online dating app Tinder, according to the Victim's interview with German police.
15. On September 1, 2017, **CRAIG** allegedly drugged and raped the Victim. That day he came to the Victim's apartment, where they talked and drank water. The next day, the Victim woke up naked in her bed and noticed bruises on her legs.³ The Victim had no idea where the bruises came from and asked **CRAIG** about them. **CRAIG** responded that he had only grabbed her a little harder and claimed that was what she had wanted. From this, the Victim understood **CRAIG** had sex with her without her knowledge or consent while she was unconscious. Furthermore, the Victim believed her memory must have been compromised by a substance that she also did not consent to take. The Victim said that **CRAIG** had the opportunity to place such a substance in her drink while she was in the bathroom.
16. The Victim said she did not immediately report this incident because **CRAIG** had consensually recorded videos of her and **CRAIG** previously having consensual sex, and **CRAIG** threatened to publish those videos if the Victim reported the rape to authorities.

³ On December 12, 2018, German police received from the Victim multiple photographs depicting bruising of one to five centimeters in diameter on her inner thighs. The Victim said that she had taken the photographs on September 2, 2017, to show the harm **CRAIG** had inflicted.

17. Then, approximately three or four weeks after **CRAIG** raped the Victim, he arrived at her apartment armed with a gun and threatened her. **CRAIG** laid his gun on the Victim's table and told her he wanted to discuss her intentions of filing a criminal complaint against him. In response to this threat, the Victim did not file a complaint against **CRAIG**.

Details of CRAIG's 2018 Aggravated Rape and Coercion Offenses

18. On June 25, 2018, the Victim met **CRAIG** late in the evening at his apartment in Berlin where he once again raped her, causing severe bodily harm. That night, **CRAIG** asked the Victim to orally ingest half of a tablet of a substance unknown to the Victim, meant to dissolve in the mouth. The Victim spat it out without **CRAIG** noticing a few moments later. **CRAIG** then forcefully rammed his hand several times into the vagina of the Victim. The Victim screamed in pain and told **CRAIG** to stop. **CRAIG** did not stop, however, and instead held onto her, pressed her body down and forward, and demanded that she count down slowly from 20. When the Victim counted down too quickly, **CRAIG** made her start over from 20 while his hand remained inside her.⁴
19. As a result of **CRAIG** violently forcing his hand inside the Victim, she sustained heavy bleeding from her vagina. **CRAIG** put a roll of paper towels into the Victim's vagina in response to the bleeding.
20. **CRAIG** then continued his sexual assault of the Victim. He forced the Victim's mouth open and made her take the other half of the tablet, which she once again spat out without **CRAIG** noticing. **CRAIG** then performed anal sex on the Victim.
21. The Victim took a taxi home and was bleeding heavily on the taxi seat and on the stairs to her apartment. When she arrived home, she received a telephone call from **CRAIG** who threatened her not to report the sexual assault or to go to the hospital because she "knows what [**CRAIG**] is capable of doing."⁵
22. Despite **CRAIG**'s threats of violence, the Victim sought medical attention for vaginal bleeding, which remained severe. The Victim provided medical records from a June 26, 2018 visit to a medical facility in Berlin. German authorities state that the document reflects that the treating physician diagnosed the Victim with a vaginal tear and a perineal tear. The same medical record documented that the Victim had surgery to repair the tears on June 26, 2018.

Identification of CRAIG as the Perpetrator of Aggravated Rape and Coercion

23. Evidence of identifying **CRAIG** as the perpetrator of these acts is robust. The Victim told German police that **CRAIG** was known to her as "Jerome." The Victim also provided

⁴ As further corroboration of **CRAIG**'s violent act, during the search of **CRAIG**'s residence, German police found multiple books detailing how to perform sexually violent acts, including one titled, "Fisting," the same type of sexual act the Victim reported.

⁵ To corroborate her interview, on December 12, 2018, the Victim gave German authorities a screenshot of her call list of June 26, 2018, which contained an incoming call from **CRAIG**.

photographs depicting **CRAIG**'s face, build, and a distinctive arm tattoo. German authorities compared these images to photographs of Jerome **CRAIG** in their database from when he was processed for identification at the Berlin State Criminal Investigation Division in June 2010. German officials stated that the processing photographs in their database showed the same facial expression, stature, and distinctive large tattoo on **CRAIG**'s arm as the photographs the Victim provided to identify **CRAIG**.

24. The Victim also provided German authorities with **CRAIG**'s apartment address where the June 2018 abuse occurred. **CRAIG** was present at that same address when German police conducted their search of the apartment in March 2019. **CRAIG** was processed for identification the same day as the search, and German police provided fingerprints, DNA identification patterns, and his German identification card in the extradition request. **CRAIG**'s identification card includes the last name "**CRAIG**" and given names "Jerome Norell Dee" and the same address where the June 2018 abuse occurred.

Details of **CRAIG**'s Possession of Child Pornography

25. Based on the Victim's accounting of the rape and coercion, and the corroborating evidence the Victim provided, German police sought and received a court-ordered search warrant for **CRAIG**'s residence. The search warrant was issued on January 8, 2019, and police executed it on March 7, 2019.
26. During the search of **CRAIG**'s residence, German authorities found multiple storage devices: (1) a WD Elements SSD external storage device ("External Storage Device"), (2) a Toshiba notebook, and (3) a Nokia mobile telephone. The extradition request includes photographs of these devices taken at **CRAIG**'s residence.
27. **CRAIG** possessed the following child pornography on the devices: at least 1,255 child pornography files including 82 video files lasting at least 5 hours and 48 minutes found on the External Storage Device; at least 181 child pornography files including 95 child pornography video files lasting at least 5 hours and 43 minutes found on the Toshiba notebook; and 2 child pornography image files found on the Nokia phone. The declaration in support of the extradition cites the report of an IT expert who analyzed the devices.
28. **CRAIG**'s collection of child pornography on the External Storage Device included:
29. Multiple images depicting sexual abuse of female babies and toddlers, including sexual intercourse, anal intercourse and oral sex between a man and these babies and toddlers. An example of that some of that content contains: One video depicting someone pressing the erect penis of a dog into the face/mouth of a baby and at least one video file depicting anal penetration of a toddler.

Identification of **CRAIG** as the Perpetrator of Child Pornography Possession

30. German authorities attribute the External Storage Device and the contents on it to **CRAIG** because (1) it was found in a bedroom they attribute to **CRAIG**, (2) it contained a curriculum

vitae bearing **CRAIG**'s name, (3) it contained a video showing **CRAIG** bearing apparent knife wounds, (4) it contained a video depicting **CRAIG** masturbating in front of a mirror and, (5) it contained several other photographs and videos depicting **CRAIG**.

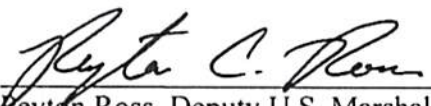
31. On the Toshiba notebook, German police found records showing **CRAIG** had visited the following locations on the dark web, which are known by the German authorities to be distribution networks for child pornographic images: Childs Play, Magic Kingdom, The Giftbox Exchange, Toy Box, Pedo Playground Archive, Topic Links 2.0 and Central Park. German authorities state that those sites were accessed on the Internet through a wired network named "Jerome" and a telephone hotspot on "Jerome's iPhone."

Location of **CRAIG** in the United States


32. On August 1, 2019, less than two weeks after the court approved **CRAIG**'s arrest warrant, **CRAIG** is believed to have arrived in the United States. Arrest records from Franklin County, Ohio show that **CRAIG** was arrested and charged with Felony Class 4 of receiving stolen property on January 19, 2020, though it appears that **CRAIG**'s case was dismissed based on prosecutorial discretion. *Ohio v. CRAIG*, Case No. 2020 CR A 001155 (2020). The arrest record depicts the same name, date of birth, and likeness as that provided by German authorities. Based on preliminary location searches of databases available to U.S. Marshals, **CRAIG** is believed to be residing in Columbus, Ohio, within the jurisdiction of this Court.
33. In addition, your affiant viewed the LinkedIn profile of **CRAIG** which indicated he worked at Honest Jobs, Inc. located at the address of 2121 Bethel Road, Suite C, in Columbus Ohio as a Junior Software Engineer.

CONCLUSION

34. Based upon the above information, your affiant submits that there is probable cause to believe that **CRAIG** has committed offenses noted above. Your affiant thereby requests that a warrant for the arrest of **CRAIG** be issued in accordance with 18 U.S.C. § 3184 and the extradition treaty between the United States and Germany, so that the fugitive may be arrested and brought before this Court to the end that the evidence of criminality may be heard and considered, and that this complaint and the warrant be placed under the seal of the Court, except as disclosure is needed for its execution, until such time as the warrant is executed.


Peyton Ross, Deputy U.S. Marshal
United States Marshals Service

Sworn to and subscribed before me this 2d day of February, 2024.


Elizabeth A. Preston Deavers
United States Magistrate Judge
United States District Court
Southern District of Ohio

